

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 2:19-cr-00441-DCN
)	
v.)	
)	
AMIR GOLESTAN)	GOVERNMENT'S MOTION
MICFO, LLC)	<u>FOR RECIPROCAL DISCOVERY</u>

The United States, by and through its undersigned attorney, moves that this Honorable Court direct the Defendant to make available for inspection and copying each of the following:

A. Pursuant to FED. R. CRIM. P. 26.2 and United States v. Nobles, 422 U.S. 225 (1975):

All prior statements in the possession of the Defendant, if any, given by witnesses whom the Defendant expects to call at trial other than the Defendant himself. The term "statements" is to be construed by the Defendant the same as defined in FED. R. CRIM. P. 26.2 (effective December 1, 1980) and the Jencks Act, 18 U.S.C. 3500.

B. Pursuant to FED. R. CRIM. P. 16(b)(1)(A):

All books, papers, documents, photographs, tangible objects, or copies of portions thereof, which are within the possession, custody, or control of the Defendant and which the Defendant intends to introduce as evidence in chief . . .

C. Pursuant to FED. R. CRIM. P. 16(b)(1)(B):

Any results or reports of . . . scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the Defendant, which the Defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the Defendant intends to call at the trial when the results or reports relate to their testimony.

D. Pursuant to FED. R. CRIM. P. 12.1:

Any notices of alibi, to include the specific place or places at which the Defendant claims to have been at the time of the alleged offense(s) and the names and address of the witnesses upon whom the Defendant intends to rely to establish such alibi.

Respectfully submitted,

SHERRI A. LYDON
UNITED STATES ATTORNEY

By: s/Nathan S. Williams
Nathan S. Williams, #10400
Assistant U.S. Attorney
151 Meeting Street, Suite 200
Charleston, South Carolina 29401-2238
(843) 727-4381

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